



0073897

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
3100 Port of Benton Blvd • Richland, WA 99352 • (509) 372-7950

September 7, 2007

Ms. Shirley J. Olinger, Acting Manager
Office of River Protection
United States Department of Energy
P.O. Box 450, MSIN: H6-60
Richland, Washington 99352

Mr. William S. Elkins, Project Director
Bechtel National, Inc.
2435 Stevens Center Place, MSIN: H4-02
Richland, Washington 99354

Re: Submittal of Hanford Facility RCRA Permit Modification Notification Form 24590-LAW-PCN-ENV-06-007; Class ¹1 Modification to the Hanford Facility Dangerous Waste and Resource Conservation and Recovery Act (RCRA) Permit for the Treatment, Storage, and Disposal of Dangerous Waste, Part III, Operating Unit 10 (Waste Treatment and Immobilization Plant), WA7890008967

0073917

Dear Ms. Olinger and Mr. Elkins:

The Department of Ecology approves the referenced Class ¹1 Modification submitted July 30, 2007. The approved Hanford Facility RCRA Permit Modification Notification Form is enclosed.

Modification 24590-LAW-PCN-ENV-06-007 provides the updated Low Activity Waste Vitrification Offgas System Bypass Analysis (24590-LAW-PER-PR-03-001, Revision 2).

If there are any questions, contact me at 509-372-7882 or Tracy Gao at 509-372-7901.

Sincerely,

Brenda Becker-Khaleel
WTP Permit Writer
Nuclear Waste Program

aah/jc
Enclosure

cc: See next page

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Ms. Olinger and Mr. Elkins
September 7, 2007
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cc electronic w/enc:

John Eschenberg, USDOE
Lori Huffman, USDOE
Tony McKarns, USDOE
Gae Neath, USDOE
Don Sommer, USDOE
William Taylor, USDOE
Brad Erlandson, BNI
Peggy Fisher, BNI
Stan Hill, BNI
Dennis Klein, BNI
Sandi Murdock, BNI
Phil Peistrup, WGI

cc w/enc:

Administrative Record: Tank Waste Treatment Requirements ^{H-0-8} ✓
Environmental Portal
USDOE-ORP Correspondence Control

Quarter Ending June 30, 2007

24590-LAW-PCN-ENV-06-007

Hanford Facility RCRA Permit Modification Notification Form**Part III, Operating Unit 10****Waste Treatment and Immobilization Plant****Index**

Page 2 of 2: Hanford Facility RCRA Permit, Operating Unit 10, Waste treatment and Immobilization Plant
Update LAW Vitrification Offgas System Bypass Analysis in Appendix 9.18 of the Dangerous Waste Permit.

Submitted by Co-Operator:

Reviewed by ORP Program Office:

D. A. Klein
D. A. Klein

6/11/07
Date

S. J. Olinger
S. J. Olinger

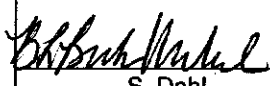
7/30/07
Date

¹ Class 1 modifications requiring prior Agency approval.

² If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to a Class '1, if applicable.

Quarter Ending June 30, 2007

24590-LAW-PCN-ENV-06-007

Hanford Facility RCRA Permit Modification Notification Form												
Unit: Waste Treatment and Immobilization Plant		Permit Part & Chapter: Part III, Operating Unit 10										
Description of Modification: The purpose of this Class 1 prime modification is to update the LAW Vitrification Offgas System Bypass Analysis. The following permit document is submitted to replace the document currently in Appendix 9.18.												
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td colspan="4" style="padding: 2px;">Appendix 9.18</td> </tr> <tr> <td style="width: 15%; padding: 2px;">Replace:</td> <td style="width: 35%; padding: 2px;">24590-LAW-PER-PR-03-001, Rev 0</td> <td style="width: 15%; padding: 2px;">With:</td> <td style="width: 35%; padding: 2px;">24590-LAW-PER-PR-03-001, Rev. 2</td> </tr> </table>					Appendix 9.18				Replace:	24590-LAW-PER-PR-03-001, Rev 0	With:	24590-LAW-PER-PR-03-001, Rev. 2
Appendix 9.18												
Replace:	24590-LAW-PER-PR-03-001, Rev 0	With:	24590-LAW-PER-PR-03-001, Rev. 2									
This modification requests Ecology approval of the specific changes to the document that are identified by revision bars. Revisions are the result of ongoing design. The following identifies the significant types of changes on the attached document.												
<ul style="list-style-type: none"> Updated discussion of LAW offgas treatment system Enhanced the discussion of automatic bypass events Added language concerning interlocks Added language concerning the bypass of the catalytic oxidizer/reducer skid or caustic scrubber. Added a new section on the actions that would be taken in the event of loss of power. Removed descriptions for Primary Melter Offgas System Component Functions and Secondary Offgas System Component Functions Added Section 4.7, Loss of LAW Facility Power Revised Figure 1, Melter Offgas System 												
WAC 173-303-830 Modification Class: ^{1,2}		Class 1	Class ¹ 1	Class 2								
Please mark the Modification Class:			X									
Enter Relevant WAC 173-303-830, Appendix I Modification citation number: N/A Enter wording of WAC 173-303-830, Appendix I Modification citation: In accordance with WAC 173-303-830(4)(d)(i), this modification notification is requested to be reviewed and approved as a Class ¹ 1 modification. WAC 173-303-830(4)(d)(ii)(A) states, "Class 1 modifications apply to minor changes that keep the permit current with routine changes to facility or its operation. These changes do not substantially alter the permit conditions or reduce the capacity of the facility to protect human health or the environment. In the case of Class 1 modifications, the director may require prior approval."												
Modification Approved: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (state reason for denial) <u>Reason for denial:</u>			Reviewed by Ecology: <div style="display: flex; justify-content: space-between; align-items: center;"> <div style="text-align: center;">  S. Dahl </div> <div style="text-align: center;"> 9/7/07 Date </div> </div>									

¹ Class 1 modifications requiring prior Agency approval.

² If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to a Class ¹1, if applicable.